



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: SIMON LAINE**

**MOS TAX: [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 11/3/06, AGAINST MOS LAINE:

1. DEPARTMENTAL RULES VIOLATION-FAIL TO SAFEGUARD DEPARTMENT PROPERTY

PENALTY: CD ISSUED

CASE CLOSED ON 11/15/07

**Disclosure # 2:**

MOS LAINE IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION(S):

1. COLUMBUS GARRETT V. CITY OF NEW YORK, ET AL, 11-CV-1518, FILED IN THE SOUTHERN DISTRICT
2. JOSE L MALDONADO V. CITY OF NEW YORK, ET AL, 12-CV-306850 FILED IN BRONX COUNTY SUPREME COURT
3. JOHN SKELTON V. CITY OF NEW YORK, ET AL. 12-CV-5031, FILED IN THE SOUTHERN DISTRICT
4. MOISES COLON V. CITY OF NEW YORK, ET AL, 304284/2015 FILED IN BRONX COUNTY SUPREME COURT

**Disclosure # 3:**

MOS LAINE WAS FOUND GUILTY AT THE DEPARTMENTAL TRIAL OF THE FOLLOWING CHARGES AND SPECIFICATIONS ARISING FROM AN INCIDENT ON OR ABOUT 8/10/10 WHILE ON DUTY AND ASSIGNED TO NARCOTICS BOROUGH BRONX:

1. MOS LAINE, AT A LOCATION KNOWN TO THIS DEPARTMENT, IN BRONX COUNTY, WAS DISCOURTEOUS TO AN INDIVIDUAL KNOWN TO THE DEPARTMENT, IN THAT MOS LAINE, WHILE LEAVING THE CONDITIONS TEAM OFFICE, STATED IN SUM AND SUBSTANCE, "I SHOULD SMASH YOU IN THE FUCKING FACE WITH THIS DOOR!"

PENALTY: MOS FORFEITED TEN (10) VACATION DAYS

CASE CLOSED ON 6/6/13.

**Disclosure # 4:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 2/15/19, AGAINST MOS LAINE:

1. DOMESTIC INCIDENT - VERBAL DISPUTE
2. FAIL TO NOTIFY - DUTY CAPTAIN/OPERATIONS

PENALTY: SCHEDULE 'A' CD

CASE CLOSED ON 3/11/19

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE  
UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.**

Eric Gonzalez  
District Attorney  
Kings County